



ASSOCIATION FOR LOCAL TELECOMMUNICATIONS SERVICES

ORIGINAL

EX PARTE OR LATE FILED

July 13, 2000

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Magalie Roman Salas
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

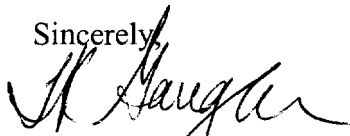
Re: **Notice of Ex Parte Presentation** in CC Docket No. 99-200,
In the Matter of Number Resource Optimization

Dear Secretary Salas,

Pursuant to Section 1.1206(a) of the Commission's Rules, 47 C.F.R. 1.1206(a), this letter is to provide notice of an *ex parte* meeting in the above-referenced proceeding on Thursday, July 13, 2000, by Teresa Gaugler of the Association for Local Telecommunications Services, Harold Salters of Personal Communications Industry Association, and Todd D. Daubert and Judith St. Ledger-Roty of Kelley, Drye & Warren LLP on behalf of CompTel. The parties met with Yog Varma, Deputy Bureau Chief of the Common Carrier Bureau, David L. Furth, Senior Legal Advisor to the Bureau Chief of the Wireless Telecommunications Bureau, L. Charles Keller, Chief of the Network Services Division, and Diane G. Harmon, Deputy Chief of the Network Services Division. During the meetings, the parties discussed carrier concerns about their ability to meet the August 1, 2000 deadline for filing Form 502 and the need for an extension of time for filing. The substance of the discussion is set forth in the attached documents.

Should you have any questions about this matter, please call me at 202-969-2587. An original and one copy of this letter are being submitted to you for inclusion in the public record.

Sincerely,


Teresa K. Gaugler

Cc: ITS, Inc.
Yog Varma
David L. Furth
L. Charles Keller
Diane G. Harmon

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**Carrier Concerns About Ability To Achieve
August 1, 2000 Date For Filing Form 502
In A Manner That Yields An Efficient And
Accurate Number Resource Utilization Forecast (NRUF)**

- **Initial Challenge**

- Understand text and rules contained in March 31, 2000 Report & Order;
- Begin to apply the knowledge of the Report & Order to each carrier's multiple inventories of numbers, billing and switching systems, in order to permit carriers to extract, reconcile and aggregate the appropriate data.

- **Actions Taken To Date**

- May 3 and 4, 2000 - Meeting with INC and carrier community to begin discussing ambiguities in Report & Order and a means of addressing ambiguities.
- Carriers working to identify gaps between what FCC rules may require, and carrier systems are able to perform.
 - Example: Carriers interpret the NRUF to require reporting of each number by rate center. Carrier systems did not record number utilization at the rate center level previously.
 - Categories FCC uses are not the categories that exist in carrier billing systems, so systems need to be recreated/tasks performed to reconcile or accommodate differences.

- **Actions Taken To Date (Cont'd)**

- Complexity of process (understanding requirements and executing) data manipulation has required carriers to obtain additional expertise through additional training or hiring.
- In many systems, no prior capability to segregate out intermediate and reserve or aged numbers in a manner consistent with FCC's rules.
- In some cases, reseller numbers treated as active; and
- For numbers reserved to resellers, some carriers have to go into account information, determine which accounts are reseller accounts (itself, not an easy task), and then determine which numbers assigned to resellers.
- Type I numbers not treated separately, in any systems, but considered intermediate for purposes of reporting.
- Some systems have no reserve category, but rather have treated as assigned.
- Need To Reconcile Data: - In many billing systems, need to reconcile circumstances where multiple records exist for one phone number. (Have to develop rules to allow this to happen, on an automated basis.)
- Need To Consolidate OCNs - Many carriers have several OCNs and have begun the process to consolidate OCNs to avoid the arduous task of completing form for each OCN.

- **Action Now Needed**

- Extension of time in which to file Form 502



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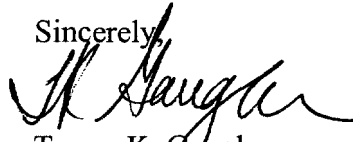
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